

1 KAMALA D. HARRIS  
Attorney General of California  
2 FRANK H. PACOE  
Supervising Deputy Attorney General  
3 MARETTA WARD  
Deputy Attorney General  
4 State Bar No. 176470  
455 Golden Gate Avenue, Suite 11000  
5 San Francisco, CA 94102-7004  
Telephone: (415) 703-1384  
6 Facsimile: (415) 703-5480  
*Attorneys for Complainant*

7  
8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

13 **MARIE KENLEE ARMAND aka**  
14 **KENLEE M. ARMAND**  
2500 Deer Valley Road, Apt. 1221  
San Rafael, CA 94903

15 **Registered Nurse License No. 663521**

16 Respondent.

Case No. *2013-864*

OAH No.

**A C C U S A T I O N**

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19  
20 Complainant alleges:

21 **PARTIES**

22 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her  
23 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
24 Consumer Affairs.

25 2. On or about August 15, 2005, the Board of Registered Nursing issued Registered  
26 Nurse License No. 663521 to Marie Kenlee Armand a.k.a. Kenlee M. Armand (Respondent).  
27 The Registered Nurse License was in full force and effect at all times relevant to the charges  
28 brought herein and will expire on August 31, 2013, unless renewed.

**JURISDICTION**

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

6. Section 118, subdivision (b), of the Code provides that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

7. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"(a) Unprofessional conduct, which includes, but is not limited to, the following:

(1) Incompetence, or gross negligence in carrying out usual certified or licensed nursing functions.

(f) Conviction of a felony or of any offense substantially related to the qualifications, functions, and duties of a registered nurse, in which event the record of the conviction shall be conclusive evidence thereof."

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1           8.     Section 2762 of the Code states:

2           "In addition to other acts constituting unprofessional conduct within the meaning of this  
3 chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this  
4 chapter to do any of the following:

5           "(a) Obtain or possess in violation of law, or prescribe, or except as directed by a licensed  
6 physician and surgeon, dentist, or podiatrist administer to himself or herself, or furnish or  
7 administer to another, any controlled substance as defined in Division 10 (commencing with  
8 Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as  
9 defined in Section 4022.

10          "(b) Use any controlled substance as defined in Division 10 (commencing with Section  
11 11000) of the Health and Safety Code, or any dangerous drug or dangerous device as defined in  
12 Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or injurious to  
13 himself or herself, any other person, or the public or to the extent that such use impairs his or her  
14 ability to conduct with safety to the public the practice authorized by his or her license.

15          "(c) Be convicted of a criminal offense involving the prescription, consumption, or  
16 self-administration of any of the substances described in subdivisions (a) and (b) of this section,  
17 or the possession of, or falsification of a record pertaining to, the substances described in  
18 subdivision (a) of this section, in which event the record of the conviction is conclusive evidence  
19 thereof.

20          "(d) Be committed or confined by a court of competent jurisdiction for intemperate use of  
21 or addiction to the use of any of the substances described in subdivisions (a) and (b) of this  
22 section, in which event the court order of commitment or confinement is prima facie evidence of  
23 such commitment or confinement.

24          "(e) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible entries in any  
25 hospital, patient, or other record pertaining to the substances described in subdivision (a) of this  
26 section."

27          9.     Health and Safety Code section 11173(a) states, in pertinent part, that no person shall  
28 obtain or attempt to obtain controlled substances, or procure or attempt to procure the

1 administration of or prescription for controlled substances by fraud, deceit, misrepresentation or  
2 subterfuge.

3 10. Code section 4060 provides, in pertinent part, that no person shall possess any  
4 controlled substance, except that furnished upon a valid prescription/drug order.

5 11. Health and Safety Code section 11377, in pertinent part, makes it unlawful to possess  
6 any controlled substance in Schedule II, subdivision (d), without a prescription.

7 12. Section 490 of the Code provides, in pertinent part, that a board may suspend or  
8 revoke a license on the ground that the licensee has been convicted of a crime substantially  
9 related to the qualifications, functions, or duties of the business or profession for which the  
10 license was issued.

11 13. Section 2736 of the Code provides, in pertinent part, that the Board may deny a  
12 license when it finds that the applicant has committed any acts constituting grounds for denial of  
13 licensure under section 480 of that code.

14 14. California Code of Regulations, title 16, section 1442, states:

15 "As used in Section 2761 of the code, 'gross negligence' includes an extreme departure from  
16 the standard of care which, under similar circumstances, would have ordinarily been exercised by  
17 a competent registered nurse. Such an extreme departure means the repeated failure to provide  
18 nursing care as required or failure to provide care or to exercise ordinary precaution in a single  
19 situation which the nurse knew, or should have known, could have jeopardized the client's health  
20 or life."

21 15. California Code of Regulations, title 16, section 1444, states:

22 "A conviction or act shall be considered to be substantially related to the qualifications,  
23 functions or duties of a registered nurse if to a substantial degree it evidences the present or  
24 potential unfitness of a registered nurse to practice in a manner consistent with the public health,  
25 safety, or welfare..."

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1        16. California Code of Regulations, title 16, section 1443, states:

2        "As used in Section 2761 of the code, 'incompetence' means the lack of possession of or the  
3 failure to exercise that degree of learning, skill, care and experience ordinarily possessed and  
4 exercised by a competent registered nurse as described in Section 1443.5."

5        17. Title 16, California Code of Regulations, section 1443.5 states:

6        "A registered nurse shall be considered to be competent when he/she consistently  
7 demonstrates the ability to transfer scientific knowledge from social, biological and physical  
8 sciences in applying the nursing process, as follows:

9        "(1) Formulates a nursing diagnosis through observation of the client's physical condition  
10 and behavior, and through interpretation of information obtained from the client and others,  
11 including the health team.

12        "(2) Formulates a care plan, in collaboration with the client, which ensures that direct and  
13 indirect nursing care services provide for the client's safety, comfort, hygiene, and protection, and  
14 for disease prevention and restorative measures.

15        "(3) Performs skills essential to the kind of nursing action to be taken, explains the health  
16 treatment to the client and family and teaches the client and family how to care for the client's  
17 health needs.

18        "(4) Delegates tasks to subordinates based on the legal scopes of practice of the  
19 subordinates and on the preparation and capability needed in the tasks to be delegated, and  
20 effectively supervises nursing care being given by subordinates.

21        "(5) Evaluates the effectiveness of the care plan through observation of the client's physical  
22 condition and behavior, signs and symptoms of illness, and reactions to treatment and through  
23 communication with the client and health team members, and modifies the plan as needed.

24        "(6) Acts as the client's advocate, as circumstances require, by initiating action to improve  
25 health care or to change decisions or activities which are against the interests or wishes of the  
26 client, and by giving the client the opportunity to make informed decisions about health care  
27 before it is provided."

28        / /

1 18. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
2 administrative law judge to direct a licentiate found to have committed a violation or violations of  
3 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
4 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being  
5 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
6 included in a stipulated settlement.

7 19. Section 490 of the Code provides, in pertinent part, that a board may suspend or  
8 revoke a license on the ground that the licensee has been convicted of a crime substantially  
9 related to the qualifications, functions, or duties of the business or profession for which the  
10 license was issued.

#### 11 DRUGS

12 20. Hydromorphone hydrochloride, also known as Dilaudid, is a Schedule II controlled  
13 substance as designated by Health and Safety Code section 11055(b) and a dangerous drug as  
14 designated by Business and Professions Code section 4022, used for pain relief.

15 21. Morphine is a Schedule II controlled substance pursuant to Health and Safety Code  
16 section 11055 and a dangerous drug within the meaning of Code section 4022. Morphine is a  
17 powerful opiate analgesic medication.

#### 18 FIRST CAUSE FOR DISCIPLINE

19 (FALSIFY, OR MAKE GROSSLY INCORRECT, GROSSLY INCONSISTENT, OR  
20 UNINTELLIGIBLE ENTRIES IN ANY PATIENT RECORD)  
21

22 22. Respondent is subject to disciplinary action under section 2762 (e ), in that while on  
23 duty as a registered nurse at the University of California San Francisco Medical Center,  
24 Respondent falsified, made grossly incorrect, grossly inconsistent, or unintelligible entries in  
25 hospital patient records, as follows:

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1        Patient 1:

2        23. On May 15, 2010, at 11:25 hours, the physician ordered "Dilaudid, 1mg IV xl. At  
3 11:24:26, Respondent removed 1mg of Dilaudid from Pyxis, using the override function.<sup>1</sup> At  
4 11:35 hours, Respondent charted administering 1 mg of Dilaudid. At 12:43:21, Respondent  
5 removed 1mg of Dilaudid from Pyxis. No physician's order was written for Dilaudid. At 12:40  
6 hours, Respondent charted administering 1 mg of Dilaudid.

7        24. On May 15, 2010, at 13:50, the physician ordered "Dilaudid, 1mg IV xl." At  
8 13:53:41, Respondent removed 1mg of Dilaudid from Pyxis, but failed to chart the administration  
9 on the Nursing Record or otherwise account for the 1mg of Dilaudid.

10       Patient 12:

11       25. On May 15, 2010, at 10:16, Respondent removed 1mg of Dilaudid from Pyxis, using  
12 the Pyxis override function. This patient was not seen in the Emergency Department and had no  
13 physician's order for Dilaudid. At 11:44, Respondent wasted 1 mg of Dilaudid.

14       Patient 14:

15       26. On May 15, 2010, at 17:09:40, Respondent removed 1 mg of Dilaudid from Pyxis,  
16 using the Pyxis override function. No physician's order was written for Dilaudid. At 17:33.:06,  
17 Respondent wasted 1 mg of Dilaudid.

18       27. On May 15, 2010, at 17:25 hours, the physician ordered "Morphine 6mg IV xl." At  
19 17:33:48 Respondent removed 2 mg of Morphine from Pyxis, using the Pyxis override function.  
20 At 17:32 hours, Respondent charted administering 6mg of Morphine.

21       28. On May 15, 2010, at 18:20 hours, the physician ordered "Dilaudid 1mg IV xl." At  
22 18:28:57 Respondent removed 1mg of Dilaudid from Pyxis, using the Pyxis override function. At  
23 18:28 hours, Respondent charted administering 1mg of Dilaudid.

24       29. On May 15, 2010, at 19:30 hours, the physician ordered "Dilaudid 1mg IV xl." At  
25 19:40:21, Respondent began to remove 1mg of Dilaudid from Pyxis, using the Pyxis override

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27 \_\_\_\_\_  
28       <sup>1</sup> Pyxis is a hospital computerized medication storage system.

1 function, but cancelled the transaction. At 19:49:20, Respondent removed 1 mg of Dilaudid from  
2 Pyxis. At 19:50 hours, Respondent charted administering 1mg of Dilaudid.

3 30. At 19:52:58, Respondent removed 1mg of Dilaudid from Pyxis. There was no  
4 physician's order for Dilaudid. Respondent failed to chart the administration on the Nursing  
5 Record or otherwise account for the 1mg of Dilaudid.

6 31. On May 15, 2010, at 21:10 hours, the physician ordered "Dilaudid 1mg IV xl." At  
7 21:43:07, Respondent removed 1mg of Dilaudid from Pyxis, using the Pyxis override function.  
8 At 21:40 hours, Respondent charted administering 1mg of Dilaudid.

9 Patient 20:

10 32. On May 7, 2010, at 19:39, Respondent removed 1mg Dilaudid from Pyxis, using the  
11 Pyxis override function. There was no physician's order for Dilaudid. At 20:28, Respondent  
12 wasted 0.5mg of Dilaudid. Respondent failed to chart the administration of the remaining 0.5mg  
13 of Dilaudid on the Nursing Record or otherwise account for the 0.5mg of Dilaudid.

14 Patient 23:

15 33. On May 12, 2010, at 10:10 hours, the physician ordered "Dilaudid 1mg IV xl." At  
16 10:19:31 A.H., RN, removed 1 mg Dilaudid from Pyxis, using the Pyxis override function. At  
17 1020 hours, the A.H. charted administering 1mg of Dilaudid. At 10:27:38, Respondent removed  
18 1mg of Dilaudid from Pyxis, but failed to chart the administration on the Nursing Record or  
19 otherwise account for the 1 mg of Dilaudid. On May 12, 2010, at 10:50 hours, the physician  
20 ordered "Dilaudid 1mg IV xl." At 10:55:30, A. H., RN, removed 1 mg Dilaudid from Pyxis,  
21 using the Pyxis override function. At 10:55 hours, the A.H. charted administering 1 mg of  
22 Dilaudid.

23 34. At 11:18:12, Respondent removed 1mg of Dilaudid from Pyxis using the Pyxis  
24 override function and at 11:19:10, returned the Dilaudid to Pyxis. At 11:37:47; Respondent  
25 removed 1 mg of Dilaudid from Pyxis using the Pyxis override function. At 13:02:03, Respondent  
26 wasted 1mg of Dilaudid. Respondent was not assigned to Patient 23 and made no notes on Patient  
27 23's medical record.  
28



1        Patient 35:

2        35. On May 16, 2010, at 1805 hours, the physician ordered "Dilaudid 1 mg IV xl." At  
3 18:11, Respondent removed 1mg of Dilaudid from Pyxis, using the Pyxis override function. At  
4 18:10 hours, Respondent charted administering 1 mg of Dilaudid.

5        36. At 19:53, Respondent removed 1 mg of Dilaudid from Pyxis. There was no  
6 physician's order for Dilaudid. At 19:56, Respondent wasted 1mg of Dilaudid. On May 16, 2010,  
7 at 20:25 hours, the physician ordered "Dilaudid 1mg IV xl." At 2034 hours, 1mg of Dilaudid was  
8 administered by another RN.

9        37. On May 16, 2010, at 21:10 hours, the physician ordered "Dilaudid 1 mg IV xl." At  
10 21:15 hours, 1mg of Dilaudid was administered by the other RN. On May 16, 2010, at 22:20  
11 hours, the physician ordered "Dilaudid 1mg IV xl." At 22:27, Respondent removed 1mg of  
12 Dilaudid from Pyxis. At 22:27 hours, Respondent charted administering 1mg of Dilaudid.

13        Patient 37:

14        38. On May 27, 2010, at 11:00 hours, the physician ordered "Morphine 2 mg IV xl." At  
15 11:00, Respondent removed 2 mg of Morphine from Pyxis using the Pyxis override function. At  
16 11:00 hours, Respondent charted administering 2 mg of Morphine.

17        39. On May 27, 2010, at 11:20 hours, the physician ordered "1mg Dilaudid IV, may  
18 repeat at 20 minutes up to 4 doses." At 11:20, Respondent removed 1 mg of Dilaudid from Pyxis  
19 using the Pyxis override function. At 11:20 hours, Respondent charted administering 1mg of  
20 Dilaudid. At 11:43, Respondent removed 1mg of Dilaudid from Pyxis. At 11:42 hours,  
21 Respondent charted administering 1 mg of Dilaudid.

22        40. At 13:15, Respondent removed 1mg of Dilaudid from Pyxis using the Pyxis override  
23 function. At 1305 hours, Respondent charted administering 1 mg of Dilaudid. At 13:23,  
24 Respondent removed 1 mg of Dilaudid from Pyxis using the Pyxis override function, eight  
25 minutes after she removed the previous dose of Dilaudid and against the physician 's order. At  
26 13:57, Respondent wasted 1mg of Dilaudid.

27        / /

Patient 51:

41. On May 8, 2010, at 03:30 hours, the physician ordered "Dilaudid 2mg PO (orally) x 1." The order was changed at 03:40 hours to "Morphine 4mg IV x1; may repeat at 20 min x1 as needed for pain." At 03:35, Respondent removed 2 mg of Dilaudid from Pyxis, using the Pyxis override function, however, there was no physician's order for Dilaudid IV. At 03:40, Respondent wasted 2 mg of Dilaudid.

42. At 03:40, Respondent removed a Dilaudid 2 mg tablet from Pyxis. At 03:47, Respondent returned the Dilaudid 2 mg tablet. At 03:58, Respondent removed 4mg Morphine from Pyxis, using the Pyxis override function. At 04:00 hours, Respondent charted administering 4 mg of Dilaudid.

Patient 56:

43. On May 9, 2010, at 17:50 hours, 19:00 hours, and 20:00 hours the physician ordered "Dilaudid 2mg IM xi." At 19:12 Respondent removed 2 mg of Dilaudid from Pyxis, using the Pyxis override function. At 19:24 Respondent wasted 2 mg of Dilaudid. Respondent was not assigned to Patient 56 and made no notes on Patient 56's chart.

Patient 58:

44. On May 9, 2010, at 23:10, the physician ordered "Dilaudid 0.6mg IV x2." At 23:12, Respondent removed 1.2 mg Dilaudid from Pyxis, using the Pyxis override function. At 23:00 hours, Respondent charted administering 0.6mg of Dilaudid.

45. At 00:10 hours, Respondent charted administering 0.6 mg of Dilaudid. On May 10, 2010, at 01:24, Respondent removed 0.6mg of Dilaudid from Pyxis, using the Pyxis override function. At 01:24, there was no physician's order in effect for Dilaudid. At 01:57, Respondent wasted 0.6mg of Dilaudid.

Patient 76:

46. On May 16, 2010, at 21:00 hours, the physician ordered "Dilaudid 1 mg IV x1." At 21:27, Respondent removed 1 mg of Dilaudid from Pyxis, using the Pyxis override function. At 21:33 hours, Respondent charted administering 1 mg of Dilaudid.

1        47. On May 16, 2010, at 22:35 hours, the physician ordered "Dilaudid 2mg IV xl." At  
2 22:38, Respondent removed 2 mg of Dilaudid from Pyxis. At 22:35 Respondent charted  
3 administering 2 mg of Dilaudid.

4        48. On May 17, 2010, at 24:05 hours, the physician ordered "Dilaudid 1mg IV." At 00:07  
5 hours, another RN charted administering 1mg of Dilaudid. On May 17, 2010, at 01:30 hours, the  
6 physician ordered "Dilaudid 2 mg IV x 1, may repeat x1."

7        49. At 02:07, Respondent removed 2mg of Dilaudid from Pyxis. At 02:08 hours,  
8 Respondent charted administering 2 mg of Dilaudid. At 02:12, Respondent removed 1mg of  
9 Dilaudid from Pyxis, using the Pyxis override function. At 02:13, Respondent wasted 1 mg of  
10 Dilaudid.

11        Patient 83:

12        50. On May 21 2010, at 15:27, Respondent removed 1 mg of Dilaudid from Pyxis, using  
13 the Pyxis override function. There was no physician's order for Dilaudid. At 16:00, Respondent  
14 wasted 1 mg of Dilaudid.

15        51. On May 21, 2010, at 15:22, the physician ordered "Morphine Sulfate 6mg IV x 1." At  
16 15:47, Respondent removed 2 mg Morphine Sulfate from Pyxis. At 15:47, Respondent removed  
17 4mg Morphine Sulfate from Pyxis. At 15:50 hours, Respondent charted administering 6mg of  
18 Morphine. On May 21, 2010, at 15:22, the physician ordered "Morphine Sulfate 4mg IV, every  
19 30 minutes, as needed for pain."

20        52. At 21:05 hours, Respondent charted administering 2 mg Morphine. Respondent did  
21 not remove Morphine from Pyxis for this patient.

22        Patient 93

23        53. On May 22, 2010, at 17:30 hours, the physician ordered "Dilaudid 0.6mg IV xl." At  
24 17:29, Respondent removed 0.6mg Dilaudid from Pyxis, using the Pyxis override function. At  
25 17:28 hours, Respondent charted administering 0.6mg of Dilaudid.

26        54. At 20:39, Respondent wasted 0.6mg of Dilaudid. At 20:40, Respondent began to  
27 remove 0.6mg Dilaudid from Pyxis, but cancelled the transaction. On May 22, 2010, at 19:40  
28

1 hours, the physician ordered "Dilaudid 0.6mg IV xi." At 1950 hours, another RN charted  
2 administering 0.6mg Dilaudid.

3 55. On May 22, 2010, at 22:15 hours, the physician ordered "Dilaudid 0.7mg IV xl." At  
4 22:20 hours, another RN charted administering 0.6mg of Dilaudid. At 22:20 hours, another RN  
5 charted administering 0.6mg of Dilaudid. At 22:37, Respondent removed 0.6mg of Dilaudid  
6 from Pyxis, using the Pyxis override function. At 22:38, Respondent returned 0.6mg of Dilaudid  
7 to Pyxis. The transaction was recorded as a return of the Dilaudid removed by another RN at  
8 22:24. No discrepancies were found.

9 Patient 106:

10 56. On May 27, 2010, at 15:21, Respondent removed 1mg of Dilaudid from Pyxis, using  
11 the Pyxis override function. There was no physician's order for Dilaudid. At 15:40, Respondent  
12 wasted 1mg of Dilaudid. On May 27, 2010, at 16:30 hours, the physician ordered "5/500  
13 Vicodin."

14 57. At 15:37 hours, Respondent removed 5mg of Hydrocodone from Pyxis, using the  
15 Pyxis override function. At 14:50 hours, Respondent charted administering "1 tab" of Vicodin.

16 Patient 108:

17 58. On May 27, 2010, at 16:05, the physician ordered "Dilaudid 2mg IV xl." At 16:15  
18 hours, Respondent charted administering 2 mg of Dilaudid. No Dilaudid was removed from  
19 Pyxis. On May 27, 2010, at 17:13, the physician ordered "Dilaudid 2mg IV xl." At 17:22 hours,  
20 another RN, charted administering 2 mg of Dilaudid. At 17:38, Respondent removed 2 mg of  
21 Dilaudid from Pyxis. At 19:21, Respondent wasted 2 mg of Dilaudid.

22  
23 **SECOND CAUSE FOR DISCIPLINE**

24 **(ILLEGALLY OBTAIN OR POSSESS CONTROLLED SUBSTANCES)**

25 59. Respondent is subject to disciplinary action under section 2762 (a), 4060 Health and  
26 Safety Code sections 11173(a) and 11377 in that while on duty as a registered nurse at the  
27 University of California San Francisco Medical Center, Respondent illegally obtained and/or  
28 possessed controlled substances as alleged above in paragraphs 22 to 58.

1 **THIRD CAUSE FOR DISCIPLINE**

2 (UNPROFESSIONAL CONDUCT)

3 60. Respondent is subject to disciplinary action under section 2761 (a) in that while on  
4 duty as a registered nurse at the University of California San Francisco Medical Center,  
5 Respondent acted unprofessionally as alleged above in paragraphs 22 to 58.  
6

7 **FOURTH CAUSE FOR DISCIPLINE**

8 (CRIMINAL CONVICTION)

9 61. Respondent is subject to disciplinary action under section 2761 (f) in that in that on or  
10 about March 17, 2009, in the State of Washington, Skagit County, District Court, Case No.  
11 C738545, Respondent was convicted by plea of guilty to a violation of RCW 46.61.502 (driving  
12 under the influence), a gross misdemeanor. Respondent was later sentenced as follows:

- 13 a. 24 months probation;  
14 b. Ordered to pay a fine of \$595.00;  
15 c. Ordered to complete alcohol evaluation and treatment;  
16 d. Required to use a DUI ignition interlock.  
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**PRAYER**

**WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number RN 663521, issued to Marie Kenlee Armand a.k.a. Kenlee M. Armand.

2. Ordering Marie Kenlee Armand to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED:

*April 8, 2013*

*Louise R. Bailey*  
LOUISE R. BAILEY, M.ED., RN

Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
*Complainant*

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